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Attorneys for Defendant PACIFIC GAS AND ELECTRIC
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**PG&E'S 28-DAY REPORT FOR
AUGUST 17-19, 2021 PSPS EVENT**

Judge: Hon. William Alsup

Defendant Pacific Gas and Electric Company (“PG&E”) respectfully submits this 28-day report for the August 17-19, 2021 Public Safety Power Shutoff (“PSPS”) event (the “PSPS Event”) pursuant to the Court’s April 29, 2021 order. (Dkt. 1386.)

The information provided in this report is based on PG&E records reviewed as of the date of this filing. The information is preliminary and subject to change and further validation.

1. How many circuits were turned off in the PSPS.

PG&E pre-emptively de-energized 96 distribution circuits as part of the PSPS Event.¹

2. How many of such circuits had limbs and/or trees blown or fallen onto the lines (as determined in the post-storm inspection).

As part of PG&E’s post-event patrols prior to re-energizing distribution circuits, PG&E identifies damage to PG&E’s assets that require repair or replacement and classifies those conditions as an instance of “damage”. PG&E’s records reflect that, during the post-event patrols of the 96 de-energized distribution circuits, conducted following the PSPS Event, such patrols identified two instances of damages attributable to vegetation.²

PG&E’s post-event patrols also identify conditions that, in the judgment of the personnel conducting the patrol, might have posed an electrical arcing risk or a risk of ignition had the circuit been energized even though there was no damage to PG&E equipment necessitating repair, and classifies those conditions as “hazards”. PG&E’s records reflect that, during the post-

¹ Because PG&E understands the scope of the Court’s April 29, 2021 order to be focused on distribution circuits, the information in this report relates only to distribution circuits. PG&E notes that there were also three transmission circuits de-energized related to the August 17-19, 2021 PSPS event. No damages or hazards were recorded during post-event patrols on these transmission circuits. Of the transmission circuits in an HFTD which were not pre-emptively de-energized as part of the PSPS Event, PG&E’s records reflect that one outage and no ignitions attributable to vegetation occurred between the start of the PSPS event of 1700 PDT on August 17 and the final weather “all clear” of 0517 PDT on August 19.

² PG&E’s records reflect that the post-event patrols identified four non-vegetation-related damages.

1 event patrols of the 96 de-energized distribution circuits, conducted following the PSPS Event, such
 2 patrols identified three instances of hazards that were attributable to vegetation.³

3 *3. How many of such strikes would, in the judgment of PG&E, have*
 4 *started a fire (regardless of size) had the circuit been energized at the*
 5 *time of the strike.*

6 While PG&E is unable to definitively determine whether any of the conditions
 7 identified in response to Question 2 would have started a fire, PG&E's post-event reporting patrols
 8 make determinations with respect to whether a given condition posed a potential risk of electrical
 9 arcing or ignition. PG&E's records reflect that, of the five instances of damages and hazards
 10 identified in response to Question 2, four such instances may have posed a risk of electrical arcing or
 11 ignition had PG&E not de-energized the circuit as part of the PSPS event.

12 *4. How many circuits left energized had limbs and/or trees blown or*
 13 *fallen onto the lines by the storm without causing a fire.*

14 Of the circuits in an HFTD which were not pre-emptively de-energized as part of the
 15 PSPS Event, PG&E's ordinary course records reflect six sustained outages attributable to vegetation
 16 on six distribution circuits during the time period between the start of the PSPS event of 1700 PDT
 17 on August 17 and the final weather "all clear" of 0517 PDT on August 19 that were not associated
 18 with an ignition.⁴

19 *5. How many circuits left energized with strikes that in fact resulted in*
 20 *fires (regardless of size).*

21 Of the circuits in an HFTD which were not pre-emptively de-energized as part of the
 22 PSPS Event because they were not forecast to meet PG&E's PSPS criteria, PG&E's ordinary course
 23 records reflect that zero ignitions were attributable to vegetation making contact with an energized

24 ³ PG&E's records reflect that the post-event patrols identified one non-vegetation-related
 25 hazard.

26 ⁴ PG&E's response here does not include outages occurring below the distribution level, *i.e.*, on
 27 secondary lines or service drops which service as few as one customer. PG&E does not in the usual
 28 course identify whether each such outage is attributable to vegetation, as opposed to contact with
 other foreign objects.

1 distribution circuit during the time period between the start of the PSPS event of 1700 PDT on
2 August 17 and the final weather “all clear” of 0517 PDT on August 19.

3 *The above five categories should each be further broken down by*
4 *those circuits that were in substantial compliance with section 4293 as*
5 *well as PG&E’s Wildfire Mitigation Plan.*

6 To maintain compliance with Section 4293 and other regulatory requirements, all of
7 PG&E’s distribution circuits in HFTDs are scheduled for routine vegetation management and
8 CEMA patrols (and, as necessary, post-fire restoration patrols). Those patrols generate orders or
9 tags for work that are then worked according to their prescribed timelines, which depend on the
10 priority of tree work identified by the inspector. In Appendix A and Appendix B, PG&E provides
11 the information responsive to Questions 1-5 on a circuit-by-circuit basis, and for each listed circuit,
12 includes the number of vegetation management tags that PG&E’s records indicate had been created
13 prior to August 17, 2021 as part of PG&E’s routine vegetation management program, CEMA
14 program or post-fire restoration program, and not marked as complete by August 17, 2021.⁵
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25 ⁵ Vegetation work that was outstanding at this time related to other programs, such as EVM,
26 system hardening and reliability patrols, have been excluded from Appendices A and B. Vegetation
27 work called for by those programs is either not aimed at section 4293 compliance or goes beyond
28 what is required for section 4293 compliance.

1 Dated: September 16, 2021

Respectfully Submitted,

2 JENNER & BLOCK LLP

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Appendix A⁶**Distribution Circuits De-Energized as Part of the August 17-19, 2021 PSPS Event**

Circuit	Circuit Miles ⁷	Number of Vegetation-Related			Number of Outstanding Vegetation Tags		
		Damages	Hazards	Damages and Hazards with Ignition Potential	Priority 1 ⁸	Priority 2 ⁹	Other ¹⁰
ANDERSON 1101	54	1	-	1	-	3	122
ANDERSON 1103	57	-	-	-	-	-	17
ANTLER 1101	90	-	-	-	-	-	104
ARBUCKLE 1101	59	-	-	-	-	-	-
ARBUCKLE 1104	138	-	-	-	-	-	-
BIG BEND 1101	77	-	-	-	-	-	304
BUCKS CREEK 1103	36	-	-	-	-	-	147
BURNEY 1101	118	-	-	-	-	2	1,046
BUTTE 1105	70	-	-	-	-	4	488
CALISTOGA 1101	202	-	-	-	-	28	414
CALISTOGA 1102	112	-	-	-	-	5	96
CALPINE 1144	32	-	-	-	-	-	-
CALPINE 1146	6	-	-	-	-	-	-
CEDAR CREEK 1101	142	-	-	-	-	4	226
CLARK ROAD 1102	197	-	-	-	-	-	91
CLOVERDALE 1102	198	-	-	-	-	1	18
CORNING 1101	243	-	-	-	-	1	21
CORNING 1102	280	-	-	-	-	-	41

⁶ Please refer to the body of this filing for an explanation of the values included herein.

⁷ The circuit miles are the total miles for the circuit listed.

⁸ Priority 1 tags are used to identify vegetation that is (1) in contact or showing signs of previous contact with a primary conductor; (2) actively failing or at immediate risk of failing and could strike PG&E's facilities; or (3) presenting an immediate risk to PG&E's facilities.

⁹ Priority 2 tags are used to identify vegetation that (1) has encroached within the PG&E minimum clearance requirements and is not in contact with a conductor or (2) has an identifiable integrity issue that does not rise to the level of a Priority 1 condition but is likely to strike facilities and may manifest into a risk before the next scheduled inspection.

¹⁰ "Other" includes non-priority tags created as a part of PG&E's routine vegetation management program, CEMA program or post-fire restoration program.

Circuit	Circuit Miles ⁷	Number of Vegetation-Related			Number of Outstanding Vegetation Tags		
		Damages	Hazards	Damages and Hazards with Ignition Potential	Priority 1 ⁸	Priority 2 ⁹	Other ¹⁰
CORTINA 1101	90	-	-	-	-	-	-
COTTONWOOD 1101	159	-	-	-	-	-	43
COTTONWOOD 1102	138	-	-	-	-	-	14
COTTONWOOD 1103	253	-	-	-	-	1	227
CRESCENT MILLS 2101	122	-	-	-	-	-	40
CRESTA 1101	5	-	-	-	-	-	-
DESCHUTES 1101	195	-	-	-	-	-	113
DESCHUTES 1104	217	-	-	-	-	-	32
DUNBAR 1101	141	-	-	-	-	-	47
DUNBAR 1102	144	-	-	-	-	2	91
DUNBAR 1103	118	-	-	-	-	1	124
ELK CREEK 1101	207	-	-	-	-	-	7
GEYSERVILLE 1101	233	-	-	-	-	8	135
GEYSERVILLE 1102	201	-	-	-	-	-	56
GIRVAN 1101	154	-	-	-	-	-	46
GIRVAN 1102	126	-	-	-	-	-	38
GLENN 1101	182	-	-	-	-	6	186
HIGHLANDS 1102	169	-	-	-	-	-	1
HIGHLANDS 1103	235	-	-	-	-	-	50
JAMESON 1102	67	-	-	-	-	-	7
JAMESON 1105	125	-	-	-	-	-	-
JESSUP 1101	149	-	-	-	-	-	40
JESSUP 1102	166	-	-	-	-	-	2
JESSUP 1103	77	-	-	-	-	3	34
KESWICK 1101	73	-	-	-	-	-	2
KONOCTI 1108	102	-	-	-	-	-	-
LAKEVILLE 1102	96	-	-	-	-	-	22
LOGAN CREEK 2102	278	-	-	-	-	-	-
MADISON 1105	108	-	-	-	-	-	-
MADISON 2101	258	-	-	-	-	5	77
MAXWELL 1105	112	-	-	-	-	-	-
MC ARTHUR 1101	224	-	-	-	-	-	26
MIDDLETOWN 1101	196	-	1	-	-	-	105
MIDDLETOWN 1102	158	-	-	-	-	-	4
MONTICELLO 1101	196	-	-	-	-	-	7

Circuit	Circuit Miles ⁷	Number of Vegetation-Related			Number of Outstanding Vegetation Tags		
		Damages	Hazards	Damages and Hazards with Ignition Potential	Priority 1 ⁸	Priority 2 ⁹	Other ¹⁰
NAPA 1112	130	-	-	-	-	-	-
OREGON TRAIL 1102	80	-	-	-	-	-	4
OREGON TRAIL 1103	184	-	-	-	-	3	47
OREGON TRAIL 1104	89	-	-	-	-	1	26
ORO FINO 1101	144	-	-	-	-	-	93
ORO FINO 1102	205	-	-	-	-	-	239
PANORAMA 1101	66	-	-	-	-	38	10
PANORAMA 1102	159	-	-	-	-	2	841
PARADISE 1104	174	-	-	-	-	-	68
PARADISE 1105	144	-	-	-	-	-	32
PARADISE 1106	58	-	-	-	-	-	90
PHILO 1101	144	-	-	-	-	-	37
PIT NO 7 1101	3	-	-	-	-	-	14
PUEBLO 1104	112	-	-	-	-	4	359
PUEBLO 1105	146	-	-	-	-	3	2
PUEBLO 2102	191	-	-	-	-	-	20
PUEBLO 2103	193	-	2	2	-	8	25
PUTAH CREEK 1102	81	-	-	-	-	-	21
PUTAH CREEK 1103	78	-	-	-	-	-	1
PUTAH CREEK 1105	114	-	-	-	-	-	-
RED BLUFF 1101	124	-	-	-	-	4	88
RED BLUFF 1103	97	-	-	-	-	-	-
RED BLUFF 1104	143	-	-	-	-	1	21
RED BLUFF 1105	80	-	-	-	-	-	-
REDBUD 1101	157	-	-	-	-	-	885
REDBUD 1102	176	-	-	-	-	-	10
RINCON 1101	104	-	-	-	-	-	23
RINCON 1103	107	-	-	-	-	5	249
SILVERADO 2102	197	-	-	-	-	-	-
SILVERADO 2103	79	-	-	-	-	2	79
SILVERADO 2104	274	-	-	-	-	12	693
SONOMA 1103	78	-	-	-	-	-	9
SONOMA 1104	157	-	-	-	-	-	33
STILLWATER 1101	57	-	-	-	-	-	83
STILLWATER 1102	127	1	-	1	-	-	47

Circuit	Circuit Miles ⁷	Number of Vegetation-Related			Number of Outstanding Vegetation Tags		
		Damages	Hazards	Damages and Hazards with Ignition Potential	Priority 1 ⁸	Priority 2 ⁹	Other ¹⁰
TYLER 1105	168	-	-	-	-	-	10
VACA DIXON 1105	160	-	-	-	-	-	-
VACAVILLE 1104	44	-	-	-	-	-	1,052
VACAVILLE 1108	109	-	-	-	-	-	5
VOLTA 1101	220	-	-	-	-	2	1,067
VOLTA 1102	211	-	-	-	-	1	1,215
WHITMORE 1101	120	-	-	-	-	6	2,081
WILDWOOD 1101	37	-	-	-	-	-	78

Appendix B¹¹**Circuits Identified in PG&E's Response to Question 4¹²**

Circuit	Circuit Miles ¹³	HFTD Tier ¹⁴	Number of Vegetation-Related		Number of Outstanding Vegetation Tags		
			Outages	Ignitions	Priority 1 ¹⁵	Priority 2 ¹⁶	Other ¹⁷
BRUNSWICK 1106	360	Tier 3	1	-	-	83*	1,534
NOTRE DAME 1104	67	Tier 3	1	-	-	2*	953
SILVERADO 2102	197	Tier 3	1	-	-	-	-
WEIMAR 1101	134	Tier 2	1	-	-	1*	38
WEST POINT 1102	367	Tier 3	1	-	-	1*	137
WILLOW CREEK 1103	111	Tier 2	1	-	-	-	-

* The presence of an outstanding Priority 2 tree tag on this circuit did not trigger inclusion in the initial scope for de-energization because the portion of the circuit associated with the Priority 2 tree work was not forecast to meet PG&E's minimum fire potential conditions.

¹¹ Please refer to the body of this filing for an explanation of the values included herein.

¹² In its response to Question 4, PG&E identified circuits in an HFTDs which were not pre-emptively de-energized as part of the PSPS Event and that sustained outages that PG&E's records attribute to vegetation during the time period between the start of the PSPS event of 1700 PDT on August 17 and the final weather "all clear" of 0517 PDT on August 19. These vegetation-related outages were not associated with an ignition.

¹³ The circuit miles listed are the total miles for the circuit.

¹⁴ The HFTD listed represents the HFTD Tier of the operating device that was used to isolate the outage.

¹⁵ Priority 1 tags are used to identify vegetation that is (1) in contact or showing signs of previous contact with a primary conductor; (2) actively failing or at immediate risk of failing and could strike PG&E's facilities; or (3) presenting an immediate risk to PG&E's facilities.

¹⁶ Priority 2 tags are used to identify vegetation that (1) has encroached within the PG&E minimum clearance requirements and is not in contact with a conductor or (2) has an identifiable integrity issue that does not rise to the level of a Priority 1 condition but is likely to strike facilities and may manifest into a risk before the next scheduled inspection.

¹⁷ "Other" includes non-priority tags created as a part of PG&E's routine vegetation management program, CEMA program or post-fire restoration program.